



17 July 2026

Mr Chris Eldridge
Senior Planning Officer Assessments
Housing Delivery Assessments

Email – chris.eldridge@dpie.nsw.gov.au

RE: Major Projects – SEARs Request – 156-166 Rickard Road, Leppington (SSD-84430209)

Reference is made to the above-described Request for SEARs that is currently being considered by the Department of Planning, Housing and Infrastructure (Department). It is noted that the Department declined an extension of time for Council to provide a submission, despite the recent gazettal of Appendix 3 of the Western Parkland City (SEPP) specific to this project. Therefore, this submission should be considered as a holding submission. A further submission will be provided with additional commentary once internal teams have had adequate time to review this project in detail.

Below is a summary of the comments that form Camden Council's response to the request for SEARs:

Current planning controls applying to the land

- On Friday 26 June 2026, Council received notification from the Department that the Leppington Town Centre Planning Proposal had been gazetted.
- Accordingly, State Environmental Planning Policy (Precincts-Western Parkland City) 2021 now includes Appendix 3 - Leppington Town Centre Precincts Plan 2026 that applies to land mapped in Leppington Town Centre Precinct.
- Any development proposed for the site should demonstrate compliance with Appendix 3 – Leppington Town Centre Precincts Plan.
- The proposed development should address the development controls in Draft Leppington Town Centre Development Control Plan.
- On 3 July 2026, an amendment to the Camden Local Environmental Plan 2010 was gazetted to exclude land pursuant to Appendix 3 - Leppington Town Centre Precincts Plan 2026 from utilizing the SEPP Housing Affordable Rental Housing contributions.
- The subject site has been rezoned from B7 Business Park and SP2 Infrastructure to MU1 Mixed Use, RE1 Public Recreation and SP2 Infrastructure. This proposal includes a concurrent rezoning application.
- The site is subject to a maximum FSR of 3:1 and a maximum building heights of 65m and 50m.



70 Central Avenue
Oran Park NSW 2570



mail@camden.nsw.gov.au



PO Box 183
Camden NSW 2570



www.camden.nsw.gov.au



13 22 63



www.facebook.com/camdenccouncil



ABN: 31 117 341 764

Concurrent planning proposal

- It's noted the SSD seeks a concurrent rezoning of 156-166 Rickard Road, Leppington to:
 - o Enable the development of over 1200 apartments across 9 buildings at the site.
 - o Increase in permissible Height of Buildings (HOB) from 50-65 m to 85 m.
 - o Increase in FSR from 3.0-3.75:1 (dependent on access to bonus provisions 6.9 & 6.10) to 5.0:1.
- Council has significant concerns in relation to the proposed rezoning and does not believe that the rezoning statement has demonstrated site specific merit. The proposed rezoning would significantly increase available FSR and HOB development standards applying to the site, when compared to the recently gazetted SARP rezoning of Leppington Town Centre.
- The finalisation report for the SARP rezoning indicates that DPHI commissioned an independent economic and feasibility report, which underpinned the increase in FSR (as compared to the draft Planning Proposal as exhibited). This has led to a 137% increase in developable floor space on the subject site, as compared to the draft Leppington Town Centre PP as exhibited. The EIRS does not include economic/feasibility justification of the need to further increase FSR to make the development of the site feasible.

The applicant has not justified a further increase in dwelling capacity on the subject site and has not considered the potential flow on effects and impact on infrastructure provision of neighbouring landowners/developers seeking similar uplift, should additional capacity be approved at the subject site.

In particular, the economic impacts of such an increase in encouraging similar uplift at neighbouring sites, the feasibility demands for such an increase in dwelling capacity and the potential impacts on infrastructure provision (particularly considering flow on impacts to neighbouring sites) have not been sufficiently developed.

- Council does however welcome the proposal to rezone around an extra 1000m² RE1 Public Recreation and would agree to a proportionate increase in FSR across the site to ensure no net loss in developable floor space (on account of the reduction in developable land on the subject site).
- It is recommended that the rezoning proposal submitted be amended to clearly consider the proposed amendments to the zoning and other planning controls applying to Leppington Town Centre since its rezoning as a SARP on Friday, 26 June 2026 only.
- The Environmental Impact and Rezoning Statement (EIRS) has not adequately addressed Clause 6.6 Active street frontage on certain land in Zone MU1, Clause 6.7 Design Excellence, Clause 6.8 Affordable housing contributions, Clause 6.9 Affordable Housing incentives or Clause 6.10 High performing building design. The development should demonstrate full compliance with these new controls pursuant to Appendix 3 of the SEPP Western Parkland City (2021).
- **Clause 6.5 Non-residential development on certain land in zone MU1:** It is noted that Clause 6.5 Non-residential development on certain land in Zone MU1 specifies that a minimum of 0.25 FSR must be developed as non-residential floor space on the subject site. Specific exclusions include residential accommodation and tourist and visitor accommodation.

The applicant has attempted to satisfy this provision through development of a Build to Rent RFB and serviced apartments, both of which are specifically excluded under clause 6.5 as residential accommodation and tourist and visitor accommodation respectively.

The objectives of Zone MU1, according to Appendix 3 of the Precincts SEPP include:

- o To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces
 - o To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.
 - o To integrate suitable business, office, residential, retail and other development in accessible locations to encourage use of public transport, walking and cycling.
- It is recommended that the proposal be reconsidered to ensure provision of a minimum of 0.25:1 non-residential FSR that meets the requirements of Clause 6.5 and that each building incorporates commercial floor space at ground level (at a minimum) and provides active street frontages to satisfy the objectives of the MU1 zone.
- **Clause 6.6 Active street frontage on certain land in Zone MU1:** The proposed development does not appear to satisfy the objectives of Zone MU1. Specifically, buildings do not appear to integrate suitable business, retail, community and other acceptable non-residential land uses on the ground floor and do not appear to provide active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.
- **Clause 6.7 Design excellence:** the EIRS mistakenly asserts that there is no design excellence requirement (at 13.3 HDA Design Review Process on page 25). As a result of the gazettal of Appendix 3 – Leppington Town Centre it is requested that the applicant must now demonstrate how Clause 6.7 is addressed in a revised EIRS, which demonstrates that the proposed development exhibits design excellence.
- **Clause 6.8 Affordable housing contributions:** the EIRS specifies that the proposal will deliver 15% affordable housing. However, this appears to be motivated by the mistaken understanding that the application will be able to access the infill affordable housing bonus available under the Housing SEPP, as described above. The applicant is requested to address Clause 6.8 which permits the consent authority to require a minimum of 3% affordable housing to be provided (with no additional incentive).
- **Clause 6.9 Affordable housing incentives:** Clause 6.9 allows for the possibility of an FSR incentive of 0.5:1 for land zoned MU1, but only where an additional 3% of residential floor space is developed as affordable housing in perpetuity. The EIRS assumes the available bonus, without addressing the provisions of Clause 6.9. The applicant is requested to address Clause 6.9 which permits an FSR bonus of 0.5:1 for land zoned MU1 where a minimum of 3% affordable housing is provided in addition to affordable housing that may be mandated under Clause 6.8.
- **Clause 6.10 High performing building design** specifies a clear pathway for applicants to access the incentive (additional 0.25:1 FSR). The applicant should be advised to demonstrate compliance with the provisions of this clause to justify the additional floor space bonus of 0.25:1.

Cumulative impact

- The Leppington Town Centre Planning Proposal, was justified by a Housing Demand Analysis, which projected demand for around 10,500 dwellings by 2041.
- To date the Minister has declared nine projects in the Leppington Town Centre as being State Significant Development. Based on the Scoping Reports, these developments seek to create a combined 7,625 dwellings. Furthermore, the Housing Delivery Authority is actively considering EOs for further major residential developments in the Leppington Town Centre that, if supported, would significantly increase this number.
- The cumulative impact that the SSD declared projects may have on the development of the wider town centre must be considered as part of the assessment of this SSD and any future application(s) (i.e. provision of sufficient public open space, traffic modelling and operation of intersections, provision of social infrastructure, maintaining sufficient employment opportunities etc.).
- It is noted that there is an SSD (SSD-99319962) currently on exhibition at 173-183 Rickard Road, Leppington for a proposed mixed use development which is located immediately to the north west of this site. Further SEARs have been issued for a proposed mixed use development at 176 Rickard Road and 225-231 Byron Road, Leppington which is immediately to the north on the adjoining site. The subject application should be assessed having regard to the cumulative impact and interface of adjoining and surrounding proposed development.

Indicative layout plan and local road network

- The assessment does not appear to adequately consider the cumulative impacts of the proposed developments on the surrounding road network, public transport operations, school traffic, pedestrian activity, or future development within the Leppington Town Centre precinct.
- The road network in the Leppington Town Centre primarily consists of rural roads that do not have the capacity to cater for the level of development planned for the town centre until such time as major road upgrades such as Rickard Road are completed.
- At this stage the State Government has not committed any funds to the physical delivery of the major road projects in the town centre such as the Rickard Road upgrade.
- The existing road network cannot cater for the level of development and density currently planned in the town centre by adjoining SSD's and DA's currently under assessment.
- To alleviate the pressure these developments will have on existing roads, it is essential that the local road network is provided in accordance with the ILP road network and delivered in a timely manner.
- The report relies on future traffic forecasts up to 2036 based on the STFM model only, the strategic models such as STFM cover a larger area and do not fully reflect the latest land use demand or detailed growth forecasts within precincts such as Leppington. Hence, the future road network assumptions should be based on the Aimsun modelling carried out by DPHI and Council (Leppington Precinct traffic model) through the Leppington Town Centre rezoning study and the road network currently being developed through Council's detailed design projects. This will

ensure the assessment reflects the most up to date road layouts, traffic demand distributions and network operations planned for the Leppington precinct.

- In addition, a 2041 assessment should be included to represent the scenario as well, which assumes a fully developed road network for the Leppington precinct and the public transport infrastructure.
- There are also several inconsistencies between this assessment and the Leppington High School transport study prepared by TTPP, which identifies that Rickard Road and Byron Road are expected to experience significant delays from 2027 onwards unless further upgrades are undertaken, whereas this assessment indicates acceptable operation of the corridor through to 2036. This discrepancy should be addressed for the 2026, 2031 and 2036 scenarios.
- Given the proximity to the Leppington Public School and future High School, the assessment should also consider school peak periods, including pick-up and drop-off activity, school-generated traffic, and associated pedestrian movements. The report identifies the weekday AM peak hour as 8:00am to 9:00am and the PM peak hour as 3:30pm to 4:30pm which falls within the school peak hours identified by TTPP. In addition, the proposed construction traffic volumes of approximately 40 to 50 truck movements per day may impact school operations and the surrounding local road network and should be assessed accordingly.

Proposed Bell Times					
School	2025		Proposed 2027		
	Bell Time	Peak Hours	Bell Time	Peak Hours	
Leppington Public School	9am – 3pm	8am – 9am 2:15pm – 3:15pm	8:45am – 2:45pm	8:15am – 8:45am 2:00pm – 3:00pm	
Leppington Preschool	N/A	N/A	8:45am – 2:45pm	8:45am – 9:15am 2:00pm – 3:00pm	
Leppington High School	N/A	N/A	9:15am – 3:30pm	8:45am – 9:15am 3:00pm – 4:00pm	

- The 2031 and 2036 traffic assumptions also do not appear to align with the Leppington Precinct traffic model and the TTPP study prepared for the Leppington High School, ongoing detailed design work, revised ILP, and other developments within the precinct. As a result, the future traffic impacts may be understated.
- Council recommends that a revised comprehensive traffic assessment be undertaken based on the latest Leppington Precinct Traffic Model. The assessment should include horizon years of 2026, 2031, 2036 and 2041 and evaluate cumulative impacts associated with surrounding developments, future bus operations and planned network changes.
- Given the scale of the proposed developments and their interaction with the future town centre, schools, transport interchange, active transport network and surrounding road system, microsimulation modelling using Aimsun or VISSIM should be undertaken. SIDRA modelling alone is not sufficient to accurately assess future transport operations and cumulative network impacts. The revised assessment should evaluate base, development and mitigation scenarios and report on intersection performance, queue lengths, delays, network performance, cumulative impacts and any required mitigation measures across all transport modes.

- Council does not support the assumption that Road 1 operates as a one-way road. Road 1 is considered as a key east-west Town Centre Road with two-way traffic movements, providing vehicle access as well as important pedestrian and cycling connection.

Council is currently undertaking detailed design for Rickard Road based on the assumption that this road is a two-way road with a full movement intersection.

A full movement intersection is required at this location, to enable direct access for all vehicle movements, including school buses to turn right into Rickard Road after school drop-off (no right turn permitted at the Byron Road intersection), and to support safe pedestrian and cyclist movements between the school, sports fields, open space areas and town centre destinations.

A dog-leg arrangement would introduce additional delays and reduced safety for pedestrians and cyclists, particularly school children crossing the intersection. It would also result in limitations to turn bay lengths and sight distances.

- A one-way arrangement would increase travel distances, vehicle delays, pedestrian walking distances and pressure on surrounding intersections. The assessment should be updated to reflect the current road network planning assumptions. In addition to this, Council has expressed concerns regarding the proposed dog-leg alignment of Road 1 to DPHI from the previous perpendicular arrangement at this intersection.

This dog-leg arrangement has potential implications for safety, accessibility, traffic operations and has significant adverse impacts on the ongoing detailed design work and the previous DA approvals.

Council considers the road needs to be straightened with minimal impact on the adjoining open space. Council can work with the proponent to refine the detailed design of this intersection to accommodate full vehicle movements, including right-turn access for school buses, to minimise east-west traffic movements along Byron Road to support efficient bus operations.

The traffic assessment and SIDRA modelling should also incorporate indicative pedestrian and cyclist demand, as the intersection is expected to experience high levels of active transport activity during peak periods due to its proximity to the school, open space and sporting fields. This will help ensure the proposed design adequately considers the operational and safety needs of all road users.

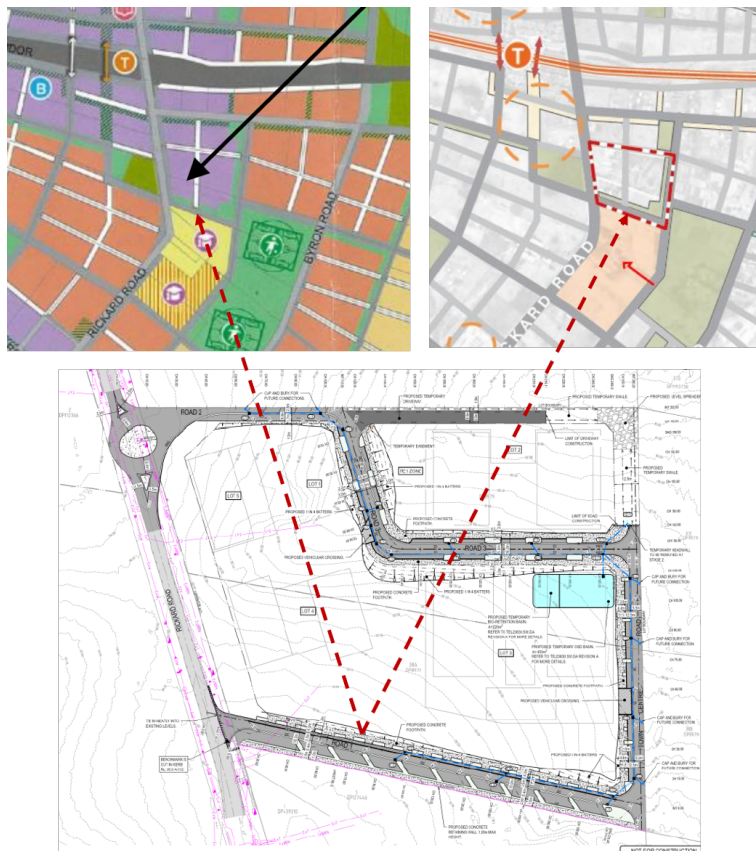
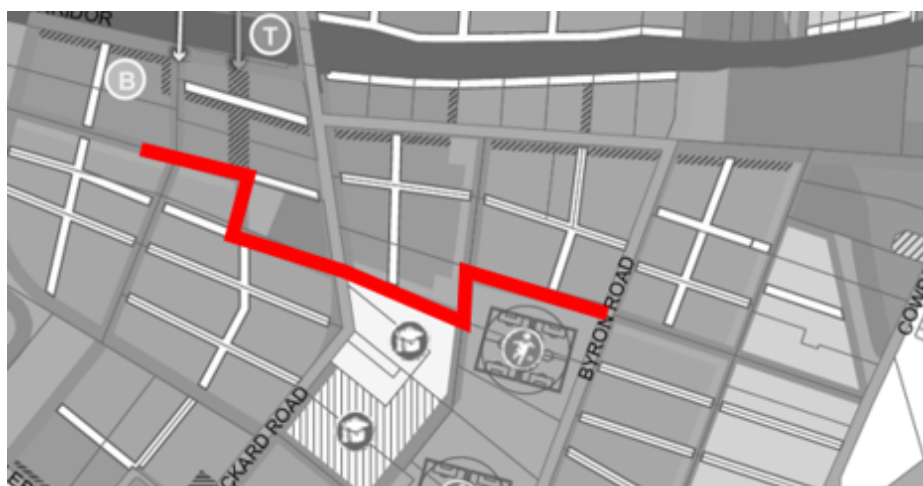


Figure of ILP overlay with proposed road layout



Road layout

- The SIDRA modelling assumptions also require further clarification. Road 1 does not appear to be included in the 2031 and 2036 modelling, which may affect the reported network performance. In addition, the modelling appears to assume that Rickard Road will operate with two general traffic lanes in each direction. This does not reflect the planned transit boulevard, where one lane in each direction will be dedicated to bus operations. Please confirm whether the SIDRA model consider that the kerbside lane will be exclusively used by bus vehicle class only and not used by other vehicle classes. Updated SIDRA models should be provided for Council's review.

Bus Access Road

- For the 2036 scenario:
 - o The assessment assumes an additional lane can be provided at the Rickard Road/Bus Access Road intersection. This widening is not considered feasible due to bridge width constraints.
 - o In addition to this, it is proposed that the bus movements in the future scenario will be via the Rickard Road/Byron Road intersection. The existing bus access arrangement to the south of Leppington Train Station is expected to be removed in the future and may ultimately function as a pedestrian-only access area.



Bus Interchange Operations

- The assessment has not adequately considered future bus interchange operations and transit corridor requirements. Current detailed design work identifies the Rickard Road and Byron Road intersection as the primary access point to the future bus interchange, which is expected to accommodate approximately 60 bus movements per hour during peak periods (Arup Transport Study, Dec 2022).

Leppington Town Centre & Precinct Key discussion points

- Leppington public transport provisions as envisaged by Transport for NSW (2021-03-04)
- Total buses/hr/direction per link shown

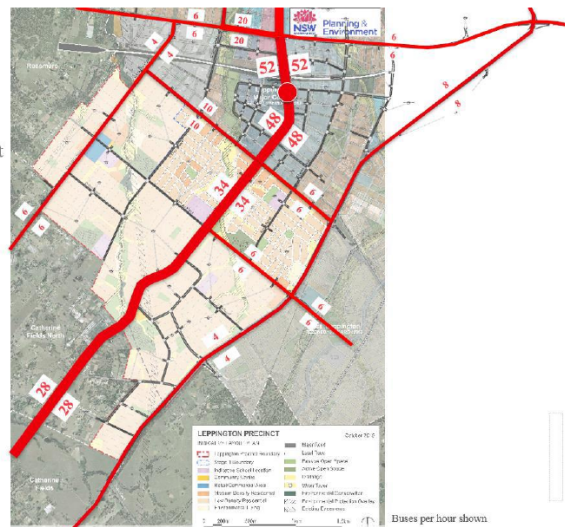
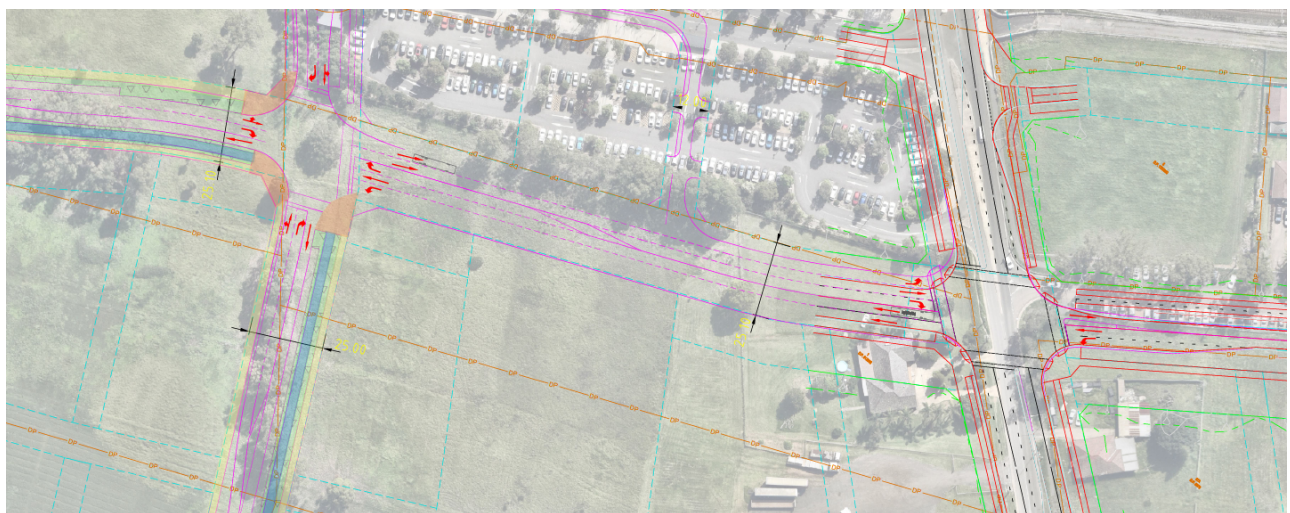


Figure 14: Proposed 2041 bus networks through LTCP (Source: TfNSW, March 2021)

- To support these bus movements, the western approach of Byron Road/Rickard Road intersection is likely to require three approach lanes and two departure lanes (refer to the below sketch from the detailed design). These future bus operation requirements should be incorporated into the assessment and reflected in the modelling assumptions. As this intersection is expected to primarily serve bus movements, the traffic distribution assumptions should also be reviewed, with traffic from 173–183 Rickard Road redirected to alternative access routes rather than relying on this intersection as a primary access point.



Car parking and access

- Concerns are raised with the narrow nature of internal roads and the impact the carriageway width may have on swept path / access for the largest vehicle intended to utilise the site.
- Submitted plans show trees in the carriageway. This is not discouraged; however, with the narrowness of the carriageway, this may impact maneuvering of medium to heavy rigid vehicles through the local streets.

- Certain accessible parking spaces have no measurements. Please ensure these spaces comply with AS (in particular, spaces without shared space allocated).
- Off street car parking spaces, aisles and driveways shall comply with the relevant Australian Standards.
- Hoarding applications shall to be submitted to Council where required during the construction stages.
- A CTMP is required to be designed and approved by the Principal Certifying Authority.
- It is noted that tandem Parking is located within the basement car parking. These spaces are only supported on the basis that they are allocated to individual units.
- Loading access should be separated from the general parking area, noting there are a number of instances where regular reverse movement of Heavy Rigid Vehicles would be required.
- Accordingly, should this development proceed, any local roads planned for the site under the ILP should be delivered as part of Stage 1.

Rickard Road Design

- Any application will need to demonstrate compliance with the most recent Rickard Road design (80% detailed design). The design will evolve over time, and the applicant is encouraged to seek advanced versions from Council as time progresses.
- The upgrade of Rickard Road is currently in the design phase, and no funds have been allocated from the State Government to construct Rickard Road.
- The subdivision plan will need to demonstrate any land proposed for dedication / road widening in accordance with the Land Acquisition SEPP map.
- The engineering plans should demonstrate the interim and ultimate interface to both Rickard Road designs.

Building Layout & Design

- An amended EIS should be prepared, and a detailed response should be provided to the design excellence provisions detailed in Clause 6.7 of Appendix 3 of the SEPP Western Parkland City (2021). The proposal is strongly recommended to be considered by the State Design Review Panel (SDRP). It is noted that the adjoining development at 176 Rickard Road, Leppington (under SSD-119567490) was required to be presented to the SDRP. It is anticipated that the same expectation would apply to the proposed development.
- The reorientation of Road No.3 through the development does not appear to be an issue; however, further site planning and orientation of buildings and street blocks could be better planned to soften the appearance at ground level.
- The layout of the blocks is not what was envisioned for Leppington Town Centre which focuses on a more 'urban' approach with consistent street walls and an emphasis on interfaces that would create streets, rather than the more internal focus demonstrated by this proposal.

- Appendix 3 of the SEPP Western Parkland City (2021) requires active street frontages, considering the strong pedestrian focus of the Leppington Town Centre where land is zoned MU1 Mixed Use.

The definition of **active street frontage**, of a building, means all premises on the ground floor of the building facing the street that are used for one or more of the following—

- (a) commercial premises,
- (b) health services facilities.

- The layout of the site with a larger number of individual buildings is creating excess interfaces to the buildings resulting in underwhelming streetscapes, solar access and amenity. A more traditional approach with more consistent and longer street walls would avoid this by reducing the 'surface area' of each building, ensuring that the limited high-quality interfaces available are used more effectively.
- The interface between 'Lot 4' and Rickard Road is primarily residential, which is inconsistent with the desired urban and commercial character envisaged for Rickard Road. Regardless, with strong residential interfaces, this could still complement Rickard Road and provide an appropriate level of activity and visual interest.
- The vehicle drop off zone at the north of 'Block 2' at 'Road 02' occupies a large amount of the ground plane and detracts from the streetscape by both introducing a dead zone in the street wall and dedicating what should be an active (or otherwise high-quality) frontage to vehicle movement. This zone should be rethought, and either reduced or removed altogether. If a vehicle drop off zone is desired, there is ample space on 'Road 03' to introduce a short-term drop off zone.
- The development data information sheet should be updated to clarify the bedroom mix for the townhouses and integrated development components. It should also specify which units are capable of adaptation for access by People with Disability (PwD) to ensure they are not only applied to a single size apartment type. Control 4.3.5(4) within the *Camden Growth Centres Development Control Plan (DCP)* requires RFBs with 10 or more units to provide at least 10% of the total units as capable of meeting the Australian Adaptable Housing Standard (AS 4299-1995).
- The serviced apartment building is highly unattractive and appears compromised by the adjoining buildings and their height. Attention should be given to the transition between the serviced apartments and the apartment buildings to ensure it does not appear dominated within the streetscape.

Engineering

- The design must be compliant with Council's Engineering Design Specifications.
- Development is to demonstrate that it meets pre/post flow conditions and water quality targets for each of the proposed stages as per Council Engineering Design Specifications.
- Sufficient OSD/WSUD details should be provided to demonstrate interim and ultimate scenarios.
- Drains/MUSIC Models should be provided for further assessment by Council.
- Architectural plans appear to show basement levels for these buildings. Civil and stormwater plans for the proposed drainage for these basement carparks should be provided to the certifier for assessment.

- There appears to be a few column locations that encroach into the clearance space per Figure 5.2 in AS2890.1. Space widths and column locations should be reviewed in these instances.
- It is unclear how the proposed roads will be treated for OSD and Water Quality as the proposed pipes don't appear to be connecting to an OSD/WSUD system. The drainage layout may need to be modified depending on the provided modelling and calculations.
- On-street parking should be line marked for clarity so the certifier can assess against AS2890.5.
- There appears to be pavement proposed within the kerb return area in relation to the intersection of Road 1 and Rickard Road. Parking should be discouraged near the intersection in this location for safety reasons and the parking/island layout should be amended to suit this.
- Swept paths should be provided for intersections and roundabouts to demonstrate the suitability of turning maneuvers. Refer to Council specifications for design and check vehicles.
- Cut and fill plans for each of the stages should be provided to the certifier.
- Grate levels for the OSD tank sections should be provided to the certifier.
- It is unclear what ARI the OSD TWL depicts in the OSD sections page.
- Section C in the OSD tank sections appears to not have enough freeboard between the OSD TWL (assumed to be the 100yr water level) and the grate level. Note that the minimum freeboard between the 100yr water level and the embankment level is 300mm for Leppington in this LGA.

Open Space

- The reconfiguration of the open space on the site appears to be an improvement over what is shown in the ILP, which was too thin to produce any useful public space and had an awkward 'notch' taken out of the south-east corner of the block.
- The reconfigured open space at the south of the site and through its centre could be successful; however, this will depend on the interfaces that it's provided with. The central spine appears to have adequate interfaces and passive surveillance, however the open space adjacent to 'Road 01' and the school site does appear isolated and awkwardly wedged between two sites turning away from it. It must be ensured that there is visibility to this space and incidental use encouraged. The "parkside interface" is mentioned at the edges of this space; however, what character it will have is still unclear and more detail would be beneficial.
- The removal of the northern open space is not considered to result in significant connectivity impacts, as the proposed southern open space retains connections to the western linear corridor and the sporting fields to the east. However, it is important to ensure that a high-quality pedestrian connection is provided along the eastern side of the development.
- The proposed plan indicates that less than 50% of the public open space receives direct sunlight between 9am and 3pm during mid-winter. The northern open space area appears to achieve better solar access. Consideration should be given to whether a larger area of open space can be provided along the northern side of the development to improve solar access and overall usability.

- Further consideration is required regarding the interface between the proposed public open space, communal open space and the residential development. The design should ensure that public open spaces maintain a clear public character and do not appear to function as private residential spaces. Consideration should be given to landscape edge and appropriate boundary treatments.
- Council supports the provision of the proposed play space. However, further detailed plans should be provided to allow a detailed assessment of equipment and materials to take place. It is recommended that no timber play equipment is proposed.
- As the proposed open space is classified as a local level open space, the proposed amenity structure is not supported by Council.
- The proposed dog park is not supported in its current location and configuration. Given the surrounding high-density residential context, there are concerns regarding potential noise impacts. The proposed area is considered insufficient to accommodate the anticipated demand and may result in overcrowding, reduced usability, and increased maintenance requirements.

Acoustics

- Any acoustic assessment shall assess for road traffic noise to a 10 year traffic forecast on the development, including both internally, external PPOS areas (including balconies), common areas, and recreational areas. Acoustic contours shall be provided.
- The acoustic report shall address the impacts of any commercial tenancies on residential development, i.e.: the noise impact from delivery vehicles and patron noise.
- An acoustic report to address construction noise is required that demonstrates the potential noise impacts associated with the high number of vehicle movements, and construction noise that will be experienced during the development of the site. The assessment is to include a detailed construction noise management plan to minimise the impact of the construction phase of the development.
- A detailed acoustic assessment shall be provided for mechanical plant to ensure compliance with the nominated criteria in the acoustic report.

Waste

- The demolition waste management plan is considered compliant as it identifies the structures to be demolished and provides estimated quantities for all waste streams in the demolition stage with an overall diversion rate exceeding Council requirements.
- It is noted the Demolition WMP identifies:
 - o Source separation and segregation of materials
 - o On-site sorting within a dedicated waste compound
 - o Reuse and recycling of suitable materials where practicable
 - o Classification of excavated materials prior to offsite transport
 - o Use of appropriately licensed recycling and disposal facilities
 - o Record keeping for all waste transport and disposal services

- o As detailed by the developer, any changes to quantities or locations need to be appropriately communicate to Council.
 - o That prior to the commencement of demolition works, the developer should provide Council with a "Site Plan for the on-site storage of materials at demolition".
- The WMP confirms that any asbestos containing materials will be identified, removed and disposed of by appropriately licensed contractors in accordance with NSW EPA and WHS requirements.
- The construction waste management plan is considered compliant as it provides estimated waste streams associated with construction activities including excavation materials. The plan targets resource recovery rates of approximately 75-85% which is considered acceptable for a development of this scale.
- It is noted the Construction WMP identifies:
 - o Reuse of suitable excavated material where appropriate.
 - o Retention and reuse of topsoil for landscaping.
 - o Segregation of recyclable materials on site.
 - o Dedicated waste storage compounds.
 - o Classification of excavated materials in accordance with NSW Waste Classification Guidelines.
 - o Utilisation of licensed waste and recycling facilities.
 - o Ongoing documentation of waste movements and disposal receipts.
 - o That prior to the commencement of construction on site, the developer will provide Council with a "Site Plan for the on-site storage of materials at construction".
- Waste Management Plan generation rates provided are acceptable. Whilst no generation rates were provided by the applicant, when rates were calculated (based on 30L per week per dwelling) the number of bins proposed were adequate. Please note Council no longer provides 1100L bins.
- It is noted that Building 5A is for serviced apartments and should be classified as commercial for the purpose of waste generation. Generation rates provided are consistent with a residential building. Servicing is identified as twice weekly for garbage and recycling and weekly for FOGO. Please note every table for every building states fortnightly for FOGO, which is incorrect.
- Inconsistent collection arrangements with some buildings nominated as having a private contractor and some with Council servicing. This needs to be clarified.

Building 1A	All waste and recycling services to be provided by Council	
Building 2A	All waste and recycling services excluding FOGO to be provided by Council	Private contractor – FOGO services
Building 2B	All waste and recycling services to be provided by Council	
Building 3A	All waste and recycling services to be conducted by private contractor	

Building 3B	All waste and recycling services to be provided by Council	
Building 3C	All waste and recycling services to be conducted by private contractor	
Building 4A	All waste and recycling services to be provided by Council	
Building 4B	All waste and recycling services to be conducted by private contractor	
Building 5A	All waste and recycling services to be conducted by private contractor	

- Buildings 2A and 2B appear to have shared FOGO and Bulky Waste rooms which is not reflected in the WMP provided.
- There are some errors in the Ongoing Waste Management Plan which is required to be amended to address the following:
 - o **Page 14 and 19**– The resource recovery facility at Spring Farm is no longer Jacks Gully and address is incorrect.
 - o **Page 28** – Management of FOGO bins appears to be a cut and paste of the recycling bin information. No FOGO servicing information is provided
 - o **Page 29** – point 14 references wrong parts and page numbers. Point 18 references incorrect Council Waste Guideline.
 - o **Page 30** – Section 5.3 Residential waste handling and management is incorrect; residents will have access to a waste service room on each floor and are not required to travel to the ground floor.
 - o Every table for all buildings referencing FOGO states the collections are fortnightly which is incorrect and is required to be addressed.
- There is regular reversing of the HRV into the designated loading areas for each of the buildings, in areas where car entrances and exits are located, potentially creating a significant risk. Separation of loading zones from general building access should be considered or at least show demonstrated safety measures in place to warn cars that HRV is moving on the site at the time.
- Swept paths have not been provided for all buildings/basements. Swept paths provided demonstrate a number of conflicts where it is not possible for a vehicle to pass the HRV when entering or exiting the site.
- No heights for the basement have been provided to assess if it is accessible by a Heavy Rigid Vehicle.
- No heights for the loading zones have been provided to ensure they are accessible.
- Access to waste rooms for each building are not demonstrated and need to consider path of travel to collection areas that are not at steep grades or up basement ramps.

- Architectural plans do not demonstrate dimensions of service rooms, bin holding rooms and bulky waste rooms.
- Waste rooms appear to be inadequate in size except for Building 3C. All waste rooms should be a minimum of 24m² and have doors of 1.8m rather than 1.5m outlined in the waste management plan.
- Service rooms on each floor of every building are inadequate. WMP states they are 1m² with internal dimensions 0.75x0.75 (equivalent to 0.56m² of available space), minimum requirements are 1.3m² of available space.

For your consideration, please give me a call (02) 4653 3716 should you require clarification on any of the above-raised points.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'J. Mesiti'.

Jessica Mesiti
TEAM LEADER DEVELOPMENT ASSESSMENT (MAJOR)



Chinese (Simplified) | 简体中文

Chinese (Traditional) | 繁體中文

العربية | Arabic

Spanish | Español

Vietnamese | Tiếng Việt

Punjabi | ਪੰਜਾਬੀ

Italian | Italiano

Assyrian | ܐܪܡܝܐ

Nepali | नेपाली

Serbian | Српски

Hindi | हिन्दी

Croatian | Hrvatski

Greek | Ελληνικά

Maltese | Malti

Filipino

German | Deutsch

Wenn Sie zum Verständnis dieser Informationen Hilfe benötigen, wenden Sie sich bitte an den Übersetzungs- und Dolmetschendienst (TIS) unter 131 450 und bitten Sie diesen, die Stadtverwaltung Camden unter der Nummer 13 22 63 für Sie anzurufen.

